

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

PARKER TIRRELL and IRIS TURMELLE,

Plaintiffs.

v.

FRANK EDELBLUT, et al.

Defendants.

Civil Action No. 1:24-cv-00251

**ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE OF  
SAMIRA SERAJI**

Pursuant to Rule 83.2(b) of the Local Civil Rules for the United States District Court for the District of New Hampshire, Plaintiffs Parker Tirrell and Iris Turmelle hereby move this Court to admit Samira Seraji of Goodwin Procter LLP to appear, defend, and practice in this case.

In support of this motion, Plaintiffs state as follows:

1. The motion is made by a member of the Bar of this Court, Kevin DeJong, who has appeared as counsel of record in the above-captioned matter.

2. Mr. Seraji is an attorney and associate at the law firm of Goodwin Procter LLP, 601 S. Figueroa Street, Suite 4100, Los Angeles, CA 90017.

3. Mr. Seraji is a member of the bar in good standing in the State of California. *See* Declaration of Samira Seraji attached hereto as **Exhibit A**.

4. There are no disciplinary proceedings pending against Mr. Seraji as a member of the bar of any jurisdiction.

5. Mr. Seraji has read and agrees to comply with the Local Rules of the United States District Court for the District of New Hampshire.

6. Counsel for Defendants do not oppose this motion.

WHEREFORE, Plaintiffs respectfully request that Samira Seraji be admitted as counsel *pro hac vice* for Parker Tirrell and Iris Turmelle. For the Court's convenience, a proposed order is attached as **Exhibit B**.

Respectfully submitted,

Dated: August 22, 2024

Plaintiffs Parker Tirrell and Iris Turmelle

By their attorney

/s/ Kevin J. DeJong

Kevin J. DeJong (NH Bar No. 17633)

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**STATEMENTS PURSUANT TO LR 7.1**

Kevin J. DeJong, counsel for Plaintiffs, hereby submits this concurrence statement pursuant to Local Rule 7.1(c) in connection with this Motion for *Pro Hac Vice* Admission, filed on August 22, 2024. Counsel for Plaintiffs has contacted Defendants' counsel, and they have assented to this Motion.

Kevin J. DeJong further states, pursuant to Local Rule 7.1(a)(2), that due to the nature of this Motion, a memorandum in support is not being filed herewith.

/s/ Kevin J. DeJong  
Kevin J. DeJong

**CERTIFICATE OF SERVICE**

I, Kevin J. DeJong, certify that this document filed through the ECF system will be sent electronically to all counsel of record as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 22, 2024.

/s/ Kevin J. DeJong  
Kevin J. DeJong